

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FAIR FIGHT ACTION, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

Civil Action File
No. 1:18-cv-05391-SCJ

**PLAINTIFFS' FEBRUARY 14, 2020, STATUS UPDATE
PURSUANT TO THE COURT'S
JANUARY 31, 2020, ORDER (ECF No. 205)**

I. Defendants' Document Productions

On Friday, February 7, Defendants sent by FedEx to Plaintiffs' e-discovery vendor in Minnesota a hard drive of "Production 29," putatively containing over 100,000 pages of documents Bates labeled STATE-DEFENDANTS-00234925 through STATE-DEFENDANTS-00335175. Plaintiffs' vendor received that hard drive the afternoon of Tuesday, February 11, and predicts it will complete the upload of those documents to Plaintiffs' e-discovery review platform by end of day on Friday, February 14.

II. Plaintiffs' Expert Witnesses

a. Status of Expert Reports

Plaintiffs have confirmed with their expert witnesses Halderman, Mayer, Herron, and McDonald that each will meet this Court's February 18, 2020, deadline for submission of expert reports. (ECF No. 8).

b. Status of Expert Deposition Scheduling

Expert	Dates and Locations Offered	Status
Dr. Halderman	February 25, in Ann Arbor or Detroit.	Date and location confirmed at Detroit airport hotel.
Dr. Mayer	February 24, 26, or 28, in Madison.	February 26 confirmed; location in Madison to be determined.
Dr. Herron	February 26, in New York City.	Confirmed for Jenner & Block.
Dr. McDonald	February 28, in Atlanta.	Confirmed at Lawrence & Bundy
Dr. Graves	February 25, in Boston.	Confirmed in Boston at MIT Sloane School.

III. Plaintiffs' List of Declarants

As the Court ordered (ECF No. 225), Plaintiffs will provide Defendants a final list of declarants by 5:00 p.m. today.

CERTIFICATE OF COMPLIANCE

I certify this Status Update has been prepared in a Times New Roman 14-point font, one of the selections this Court has approved. *See* LR 5.1(C)(3).

Respectfully submitted, this, the 14th day of February, 2020.

/s/ Leslie J. Bryan

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CERTIFICATE OF SERVICE

I hereby certify that, on February 14, 2020, I caused to be served the foregoing **PLAINTIFF'S FEBRUARY 14, 2020, STATUS UPDATE PURSUANT TO THE COURT'S JANUARY 31, 2020, ORDER (ECF No. 205)** by filing it through the Court's ECF system, which will serve the following counsel:

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